

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Ely Gemborys, *on behalf of himself and all
others similarly situated*,

Plaintiff,

v.

Cenlar Agency, Inc.,

Defendant.

Civil Action No.: 4:20-cv-40006-TSH

**MOTION FOR (1) AN AWARD OF ATTORNEYS' FEES AND EXPENSES AND
(2) AN INCENTIVE AWARD TO THE NAMED PLAINTIFF**

Pursuant to Fed. R. Civ. P. 23(h), Plaintiff Ely Gemborys ("Plaintiff") and Class Counsel respectfully move this Court for an Order of attorneys' fees of \$140,875.00, expenses of \$3,773.59 and for an incentive award to the Plaintiff in the amount of \$10,000.

In support, Plaintiff and Class Counsel submit the accompanying memorandum of law in support and the Declarations of Sergei Lemberg and Stephen F. Taylor.

For the reasons set forth in the accompanying memorandum, Plaintiff and Class Counsel respectfully request that the Court grant this motion and award the requested fees, expenses and incentive award.

Dated: March 19, 2021

/s/ Stephen Taylor

Sergei Lemberg
Stephen Taylor
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CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2021, I served a true and accurate copy of the foregoing to counsel of record through the Court's CM/ECF system which sent notice of such filing to all counsel of record.

/s/ Stephen Taylor
Stephen Taylor